

**EXHIBIT D**  
**[Invoice through May 31, 2023]**



PACHULSKI  
STANG  
ZIEHL &  
JONES

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

Diocese of Buffalo O.C.C.

October 4, 2023  
Invoice 133717  
Client 18502.00002

RE: Committee Representation

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2023**

FEES	\$98,400.00
EXPENSES	\$7,570.64
LESS COURTESY DISCOUNT FOR TRAVEL RELATED FEES	-\$19,600.00
<b>TOTAL CURRENT CHARGES</b>	<b>\$86,370.64</b>
<b>BALANCE FORWARD</b>	<b>\$635,044.22</b>
<b>LAST PAYMENT</b>	<b>-\$247,913.20</b>
<b>TOTAL BALANCE DUE</b>	<b>\$473,501.62</b>

Pachulski Stang Ziehl & Jones LLP  
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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IAWN	Nasatir, Iain A.W.	Partner	700.00	55.70	\$38,990.00
IDS	Scharf, Ilan D.	Partner	700.00	70.30	\$49,210.00
BMM	Michael, Brittany Mitchell	Counsel	700.00	9.70	\$6,790.00
GNB	Brown, Gillian N.	Counsel	700.00	1.70	\$1,190.00
KLL	LaBrada, Kerri L.	Paralegal	300.00	0.90	\$270.00
YPD	Derac, Yves P.	Paralegal	300.00	6.50	\$1,950.00
			<hr/> 144.80		<hr/> \$98,400.00

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis and Recovery	3.60	\$2,520.00
CA	Case Administration	2.60	\$1,460.00
CP	PSZJ Compensation	9.90	\$4,330.00
GC	General Creditors' Committee	9.50	\$6,650.00
IC	Insurance Coverage	33.60	\$23,520.00
ME	Mediation	51.70	\$36,190.00
RPO	Other Professional Retention	0.70	\$490.00
SL	Stay Litigation	5.20	\$3,640.00
TR	TRAVEL	28.00	\$19,600.00
		<hr/> 144.80	<hr/> \$98,400.00

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**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$1,162.95
Auto Travel Expense [E109]	\$989.05
Working Meals	\$620.33
Delivery/Courier Service	\$70.00
Hotel Expense [E110]	\$3,628.01
Pacer - Court Research	\$0.30
Online Research	\$1,100.00
	<hr/>
	\$7,570.64

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Analysis and Recovery</b>						
05/05/2023	BMM	AA	Follow-up with Diocese regarding missing financial productions.	0.50	700.00	\$350.00
05/15/2023	BMM	AA	Review document production.	1.10	700.00	\$770.00
05/16/2023	BMM	AA	Communication with appraiser regarding documents and information from the Diocese.	0.20	700.00	\$140.00
05/25/2023	BMM	AA	Update financial chart based on latest MOR filing.	0.30	700.00	\$210.00
05/26/2023	BMM	AA	Communications with I. Nasatir regarding insurance reserves.	0.60	700.00	\$420.00
05/30/2023	BMM	AA	Meeting with Stout regarding appraisal work.	0.40	700.00	\$280.00
05/30/2023	IDS	AA	Zoom with Stout regarding appraisal	0.50	700.00	\$350.00
				<b>3.60</b>		<b>\$2,520.00</b>
<b>Case Administration</b>						
05/01/2023	BMM	CA	Participate in meeting with Diocese counsel regarding ongoing case issues.	0.30	700.00	\$210.00
05/01/2023	IDS	CA	Call with BSK team regarding mediation, parish stay.	0.40	700.00	\$280.00
05/05/2023	KLL	CA	Review docket and update critical dates memo.	0.20	300.00	\$60.00
05/08/2023	BMM	CA	Call with debtor's counsel regarding ongoing case issues.	0.20	700.00	\$140.00
05/08/2023	IDS	CA	Call with BSK re mediation.	0.20	700.00	\$140.00
05/12/2023	KLL	CA	Review docket and update critical dates memo.	0.20	300.00	\$60.00
05/15/2023	BMM	CA	Meet with Diocese's counsel regarding ongoing case issues.	0.20	700.00	\$140.00
05/15/2023	IDS	CA	Call with BSK regarding pending matters	0.40	700.00	\$280.00
05/19/2023	KLL	CA	Review docket and update critical dates memo to same.	0.30	300.00	\$90.00
05/26/2023	KLL	CA	Review docket and update critical dates memo.	0.20	300.00	\$60.00
				<b>2.60</b>		<b>\$1,460.00</b>

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**PSZJ Compensation**

05/15/2023	GNB	CP	Work on PSZJ monthly fee application.	0.40	700.00	\$280.00
05/16/2023	GNB	CP	Work on PSZJ monthly fee application.	0.40	700.00	\$280.00
05/16/2023	YPD	CP	Research and review of Case and review Claims Agent employed and Docket thereof re Fee Statements and Interim Fee Applications and review of applications; and review of Docket for Order thereon.	1.20	300.00	\$360.00
05/16/2023	YPD	CP	Analysis of prior Fee Statements filed by professionals and PSZJ.	0.30	300.00	\$90.00
05/16/2023	YPD	CP	Review email from G. Brown re fee statements and respond to same; and telephone conference with G. Brown re Feb-April 2023 PSZJ fee statements.	0.10	300.00	\$30.00
05/16/2023	YPD	CP	Draft of PSZJ monthly fee statement for February 2023 (.8); and preparation of certificate of no objection to same (.2).	1.00	300.00	\$300.00
05/16/2023	YPD	CP	Revision to PSZJ February 2023 fee statement and update same; and revision to CNO related to February 2023 fee statement.	0.20	300.00	\$60.00
05/16/2023	YPD	CP	Preparation of email to G. Brown re fee statement and format attachments for same.	0.30	300.00	\$90.00
05/17/2023	GNB	CP	Work on PSZJ monthly fee application.	0.20	700.00	\$140.00
05/17/2023	YPD	CP	Analysis of email from G. Brown and review of attachment of Feb 2023 Statements for Monthly Fee Statement preparation.	0.40	300.00	\$120.00
05/17/2023	YPD	CP	Preparation of draft of PSZJ March 2023 fee statement and April 2023 fee statement.	0.60	300.00	\$180.00
05/17/2023	YPD	CP	Review email from G. Brown and review of attachment and respond to email thereto(.1); revision to PSZJ Feb 2023 fee statement as per G. Brown comments (.1).	0.20	300.00	\$60.00
05/18/2023	YPD	CP	Research and review of Stretto link and docket re PSZJ prior interim monthly fee statement and recent fee application and verify recent fee statement.	0.40	300.00	\$120.00
05/18/2023	YPD	CP	Review email from G. Brown re Feb 2023 fee statement and respond to email (.1); review of documents and format attachments to email on same (.1).	0.20	300.00	\$60.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/20/2023	IDS	CP	Review omnibus UST fee application objection regarding objections to non-PSZJ professionals	1.20	700.00	\$840.00
05/22/2023	GNB	CP	Review and revise PSZJ February 2023 monthly fee statement; telephone conference with Y. Derac regarding same.	0.10	700.00	\$70.00
05/22/2023	GNB	CP	Edit PSZJ March 2023 bill.	0.20	700.00	\$140.00
05/22/2023	YPD	CP	Analysis of redline document and revision/update to 1st, 2nd and 3rd PSZJ Monthly Fee Statements for filing thereof.	0.60	300.00	\$180.00
05/22/2023	YPD	CP	Analysis of email from G. Brown to J. Stang and I. Scharf and review of J. Stang response on same and B. Michael's approval thereof.	0.20	300.00	\$60.00
05/24/2023	GNB	CP	Edit PSZJ April 2023 monthly fee statement.	0.10	700.00	\$70.00
05/25/2023	YPD	CP	Finalize all Fee Statements and email same and Invoices to G. Brown for approval.	0.20	300.00	\$60.00
05/25/2023	YPD	CP	Further revisions to Feb, March and April 2023 PSZJ fee statements thereof.	0.60	300.00	\$180.00
05/31/2023	IDS	CP	Review monthly fee statements	0.80	700.00	\$560.00
				<u>9.90</u>		<u>\$4,330.00</u>

### General Creditors' Committee

05/02/2023	BMM	GC	Participate in call with SCC regarding ongoing case issues.	0.90	700.00	\$630.00
05/02/2023	IAWN	GC	Telephone call with SCC re mediation.	0.90	700.00	\$630.00
05/02/2023	IDS	GC	Call with SCC regarding mediation.	0.90	700.00	\$630.00
05/04/2023	IDS	GC	Email memo to committee re case status.	0.60	700.00	\$420.00
05/08/2023	BMM	GC	Respond to SCC question regarding claim.	0.20	700.00	\$140.00
05/15/2023	IDS	GC	Draft detailed agenda for committee meeting	0.90	700.00	\$630.00
05/22/2023	IDS	GC	Counsel call regarding mediation	0.80	700.00	\$560.00
05/22/2023	IDS	GC	Meeting with Boyd regarding properties	0.80	700.00	\$560.00
05/23/2023	IDS	GC	Follow up meeting with SCC regarding mediation	1.50	700.00	\$1,050.00



				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/25/2023	BMM	GC	Respond to creditor questions regarding case status.	0.10	700.00	\$70.00
05/30/2023	IDS	GC	Email to committee in lieu of meeting.	0.60	700.00	\$420.00
05/31/2023	IDS	GC	Call with Mattson regarding case status	0.70	700.00	\$490.00
05/31/2023	IDS	GC	Call with survivor regarding case status	0.60	700.00	\$420.00
				<b>9.50</b>		<b>\$6,650.00</b>

### Insurance Coverage

05/02/2023	IDS	IC	Continue update and revision of coverage analysis under various scenarios.	1.10	700.00	\$770.00
05/09/2023	IDS	IC	Detailed review of claims covered by Merchants	3.80	700.00	\$2,660.00
05/09/2023	IDS	IC	Update Merchants' exposure analysis	2.20	700.00	\$1,540.00
05/09/2023	IDS	IC	Counsel call regarding insurer demands	0.90	700.00	\$630.00
05/09/2023	IDS	IC	Update coverage analysis following counsel call	2.20	700.00	\$1,540.00
05/09/2023	IDS	IC	Email to SCC regarding coverage	0.70	700.00	\$490.00
05/10/2023	GNB	IC	Email with I. Nasatir regarding documents from Blank Rome; Email with Ben Downing regarding same.	0.10	700.00	\$70.00
05/10/2023	IAWN	IC	Telephone call with I. Scharf re insurance.	0.40	700.00	\$280.00
05/10/2023	IDS	IC	Discussion with I. Nasatir re insurance.	0.40	700.00	\$280.00
05/10/2023	IDS	IC	Initial review of newly produced policy documents.	1.90	700.00	\$1,330.00
05/11/2023	IDS	IC	Memo to committee regarding coverage position and demands	2.20	700.00	\$1,540.00
05/11/2023	IDS	IC	Revise and update coverage analysis	2.60	700.00	\$1,820.00
05/12/2023	IAWN	IC	Review Diocese of Buffalo policies sent by debtor.	2.40	700.00	\$1,680.00
05/15/2023	IAWN	IC	Review and analyze recently produced insurance policies.	3.20	700.00	\$2,240.00
05/15/2023	IAWN	IC	Draft email and send email to I. Scharf summarizing coverage issues.	0.20	700.00	\$140.00
05/15/2023	IAWN	IC	Draft email for I. Scharf re aggregate issue.	0.20	700.00	\$140.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/15/2023	IAWN	IC	Telephone call with I. Scharf re coverage issues.	0.20	700.00	\$140.00
05/17/2023	IDS	IC	Continue review of documents regarding potential insurance	1.50	700.00	\$1,050.00
05/21/2023	IDS	IC	Work on Hartford demand.	1.80	700.00	\$1,260.00
05/21/2023	IDS	IC	Work on morality clauses/submilimits research	1.70	700.00	\$1,190.00
05/21/2023	IDS	IC	Work on NDA	1.20	700.00	\$840.00
05/25/2023	BMM	IC	Call with I. Scharf regarding insurance 2004s.	0.10	700.00	\$70.00
05/25/2023	BMM	IC	Communications with team regarding insurance 2004 motions.	0.20	700.00	\$140.00
05/28/2023	GNB	IC	Email B. Michael regarding Rule 2004 motion directed to insurers.	0.20	700.00	\$140.00
05/29/2023	BMM	IC	Draft 2004 motion for insurance.	1.80	700.00	\$1,260.00
05/30/2023	BMM	IC	Call with I. Scharf regarding insurance 2004s.	0.40	700.00	\$280.00
				<b>33.60</b>		<b>\$23,520.00</b>

## Mediation

05/01/2023	IDS	ME	Call with mediator.	0.40	700.00	\$280.00
05/02/2023	IAWN	ME	Review I. Scharf agenda.	0.10	700.00	\$70.00
05/02/2023	IDS	ME	Call with S. Donato regarding mediation, parish stay.	0.40	700.00	\$280.00
05/08/2023	IDS	ME	Call with NeMoyer re mediation.	0.30	700.00	\$210.00
05/10/2023	IDS	ME	Draft email to SCC re mediation counter.	1.20	700.00	\$840.00
05/15/2023	IDS	ME	Call with BSK regarding mediation	0.50	700.00	\$350.00
05/16/2023	IAWN	ME	Review and analyze I. Scharf emails re demands v. policy limits.	1.20	700.00	\$840.00
05/16/2023	IAWN	ME	Review Diocese of Buffalo insurance policies re aggregate limits and exchange emails with M. Finnegan re same.	1.30	700.00	\$910.00
05/17/2023	IAWN	ME	Exchange emails with I. Scharf re policies for M. Finnegan.	0.20	700.00	\$140.00
05/17/2023	IAWN	ME	Review Diocese of Buffalo policies re aggregate limits.	1.00	700.00	\$700.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/17/2023	IAWN	ME	Review I. Scharf email to Committee re options.	0.10	700.00	\$70.00
05/17/2023	IDS	ME	Memo (email) to committee regarding insurer mediation	1.20	700.00	\$840.00
05/18/2023	IDS	ME	Meeting with NeMoyer and SCC	1.00	700.00	\$700.00
05/18/2023	IDS	ME	Draft demand to NeMoyer	1.20	700.00	\$840.00
05/19/2023	IAWN	ME	Draft lengthy email to M. Finnegan re aggregate limits.	0.50	700.00	\$350.00
05/19/2023	IAWN	ME	Exchange emails with debtor re Merchant and Pacific evidence of policies.	0.20	700.00	\$140.00
05/20/2023	IAWN	ME	Email coverage counsel re missing policies.	0.10	700.00	\$70.00
05/20/2023	IAWN	ME	Review file re missing policies.	0.80	700.00	\$560.00
05/20/2023	IDS	ME	Draft on mediation agreement	1.10	700.00	\$770.00
05/20/2023	IDS	ME	Emails with Donato regarding mediation dates.	0.20	700.00	\$140.00
05/20/2023	IDS	ME	Call with Donato regarding mediation dates	0.20	700.00	\$140.00
05/21/2023	IDS	ME	Work on mediation agreement.	1.80	700.00	\$1,260.00
05/22/2023	IAWN	ME	Prepare for mediation reviewing policies and emails, research CM sublimit.	2.50	700.00	\$1,750.00
05/23/2023	BMM	ME	(Partial) Participate in mediation via Zoom.	0.90	700.00	\$630.00
05/23/2023	IAWN	ME	Attend mediation.	7.50	700.00	\$5,250.00
05/23/2023	IDS	ME	Attend mediation	7.50	700.00	\$5,250.00
05/24/2023	BMM	ME	(Partial) Participate in mediation via Zoom.	1.20	700.00	\$840.00
05/24/2023	IAWN	ME	Attend mediation.	7.00	700.00	\$4,900.00
05/24/2023	IDS	ME	Attend mediation	7.00	700.00	\$4,900.00
05/24/2023	IDS	ME	Email to committee regarding mediation	0.80	700.00	\$560.00
05/24/2023	IDS	ME	Meeting with committee prior to mediation	0.50	700.00	\$350.00
05/25/2023	BMM	ME	Review emails regarding upcoming mediations.	0.10	700.00	\$70.00
05/26/2023	IAWN	ME	Exchange emails with mediator and insurers re timing of mediation.	0.30	700.00	\$210.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/31/2023	IAWN	ME	Telephone conference with I. Scharf re mediation.	0.10	700.00	\$70.00
05/31/2023	IAWN	ME	Review Claro answers to claims issues raised by insurers.	1.30	700.00	\$910.00
				<u>51.70</u>		<u>\$36,190.00</u>

**Other Professional Retention**

05/30/2023	IDS	RPO	Initial review of KLW retention application	0.70	700.00	\$490.00
				<u>0.70</u>		<u>\$490.00</u>

**Stay Litigation**

05/01/2023	IDS	SL	Call with Boyd regarding mediation, parish stay.	0.30	700.00	\$210.00
05/01/2023	IDS	SL	Review pleadings regarding parish stays and Bucki decision regarding same.	1.80	700.00	\$1,260.00
05/02/2023	IDS	SL	Call with Boyd regarding parish stay.	0.30	700.00	\$210.00
05/02/2023	IDS	SL	Review precedent regarding parish stays in WDNY.	1.20	700.00	\$840.00
05/04/2023	IDS	SL	Call with S. Donato re parish stay.	0.40	700.00	\$280.00
05/08/2023	IDS	SL	Analysis of stay relief process, prospects of success.	1.20	700.00	\$840.00
				<u>5.20</u>		<u>\$3,640.00</u>

**TRAVEL**

05/22/2023	IAWN	TR	Travel from California to New York	9.00	700.00	\$6,300.00
05/23/2023	IAWN	TR	Travel from New York to Buffalo	2.00	700.00	\$1,400.00
05/24/2023	IAWN	TR	Travel from Buffalo to Newark	2.50	700.00	\$1,750.00
05/25/2023	IAWN	TR	Travel from Newark to California	10.50	700.00	\$7,350.00
05/25/2023	IDS	TR	Travel from Buffalo to New Rochelle	4.00	700.00	\$2,800.00
				<u>28.00</u>		<u>\$19,600.00</u>

**TOTAL SERVICES FOR THIS MATTER:**

**\$98,400.00**

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**Expenses**

03/16/2023	BM	Business Meal [E111] LGA & Cibo food store, working meal, IDS	27.13
03/16/2023	BM	Business Meal [E111] LGA Rossi Pizzeria, working meal, IDS	11.58
03/20/2023	AF	Air Fare [E110] Delta Airlines, Tkt#0062363077790, additional collection, IDS	44.85
03/28/2023	BM	Business Meal [E111] Hofbräuhaus Buffalo, working meal, IDS	378.51
03/28/2023	HT	Hotel Expense [E110] Westin Hotel, 2 nights, IDS	344.66
03/28/2023	HT	Hotel Expense [E110] Westin Buffalo, 2 nights, IDS	339.82
03/29/2023	BM	Business Meal [E111] Starbucks, working meal, IDS	32.08
03/30/2023	BM	Business Meal [E111] Jake's Cafe, IDS	3.75
03/30/2023	BM	Business Meal [E111] Spot Coffee, IDS	7.66
03/30/2023	BM	Business Meal [E111] Westin Buffalo, IDS	8.70
03/31/2023	AF	Air Fare [E110] Delta Airlines, Tkt.# 00623740308461, From, LGA/BUF/JFK, IDS	250.00
03/31/2023	AT	Auto Travel Expense [E109]Uber Transportation Service, IAWN	76.94
04/14/2023	AF	Air Fare [E110] et Blue Airlines, Tkt.#27979597696201, From CIT/JFK/BUF, IAWN	179.70
04/21/2023	DC	Delivery/ Courier Service [E107] Mobile Parcel Carriers, Inv. 240809, S. Winns	70.00
05/17/2023	AT	Auto Travel Expense [E109] Uber Transportation Services, IAWN	18.97
05/20/2023	AT	Auto Travel Expense [E109] Uber Transportation Services, IAWN	189.19
05/21/2023	HT	Hotel Expense [E110] Westin Buffalo, 4 nights, IDS	1,311.54
05/22/2023	AF	Air Fare [E110] Delta Airlines, Tkt.# 0062104220325, From GSO/LGA - LGA/BUF - 5/25/23 From BUF - DTW - DTW-GSO, P. Starks	688.40
05/22/2023	AT	Auto Travel Expense [E109] Lyft Transportation Service, P. Starks	30.67
05/22/2023	AT	Auto Travel Expense [E109] KLS Worldwide Chauffeured Services, Inv.#3007525, From Residence to LAX, IAWN	403.79

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05/22/2023	BM	Business Meal [E111] TWA Roof Top, working meal, IAWN (Write- off)	87.54
05/22/2023	HT	Hotel Expense [E110] Embassy Suites, 3 nights, P. Starks	658.27
05/22/2023	HT	Hotel Expense [E110] Embassy Suites, 3 nights, R. MacAlister	723.47
05/23/2023	AT	Auto Travel Expense [E109] Uber Transportation Service, IAWN	131.71
05/23/2023	AT	Auto Travel Expense [E109] Taxi Service, IAWN	55.38
05/24/2023	AT	Auto Travel Expense [E109] Uber Transportation Service, IAWN	57.46
05/24/2023	BM	Business Meal [E111] Bella Ciao, working meal, P. Starks	63.38
05/24/2023	HT	Hotel Expense [E110] Embassy Suites Buffalo N.Y., IAWN	250.25
05/25/2023	AT	Auto Travel Expense [E109] Lyft Transportation Service, P. Starks	24.94
05/31/2023	RS	Research [E106] Everlaw, Inc. Inv. 83127	1,100.00
05/31/2023	PAC	Pacer - Court Research	0.30
<b>Total Expenses for this Matter</b>			<b>\$7,570.64</b>

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**A/R STATEMENT**

Outstanding Balance from prior invoices as of 05/31/2023			(May not include recent payments)	
<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fee Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
125270	04/30/2020	\$10,919.25	\$0.00	\$10,919.25
125276	05/31/2020	\$15,230.75	\$0.00	\$15,230.75
125334	06/30/2020	\$4,156.25	\$0.00	\$4,156.25
126177	07/31/2020	\$5,150.25	\$0.00	\$5,150.25
126524	08/31/2020	\$7,891.75	\$0.00	\$7,891.75
128245	03/31/2021	\$3,448.23	\$0.00	\$3,448.23
128247	04/30/2021	\$15,660.47	\$0.00	\$15,660.47
132453	02/28/2023	\$54,400.00	\$10,837.68	\$65,237.68
132106	04/04/2023	\$32,140.00	\$2,990.25	\$35,130.25
132459	04/30/2023	\$37,450.00	\$1,734.49	\$39,184.49
132425	05/17/2023	\$53,790.00	\$5,658.17	\$59,448.17
133723	06/30/2023	\$69,770.00	\$10,727.96	\$80,497.96
134192	07/31/2023	\$44,230.00	\$945.48	\$45,175.48
<b>Total Amount Due on Current and Prior Invoices:</b>				<b>\$473,501.62</b>